

EXHIBIT

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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
NEWPORT NEWS DIVISION

BOBBY BLAND, DANIEL RAY CARTER, JR.,
DAVID W. DIXON, ROBERT W. MCCOY,
JOHN C. SANDHOFER, and
DEBRA H. WOODWARD,

Plaintiffs,

CASE NO.
4:11-CV-45

v.

B.J. ROBERTS, individually and in
his official capacity as Sheriff of
the City of Hampton, Virginia,

Defendant.

DEPOSITION UPON ORAL EXAMINATION
OF KAREN BOWDEN,
TAKEN ON BEHALF OF THE PLAINTIFFS

Virginia Beach, Virginia

October 4, 2011

Appearances:

PATTEN, WORNOM, HATTEN & DIAMONSTEIN, L.C.
By: JAMES H. SHOEMAKER, JR., ESQUIRE
Counsel for the Plaintiffs

PENDER & COWARD
By: JEFF W. ROSEN, ESQUIRE
Counsel for the Defendant

1 A. I'm not certain. I don't know.

2 Q. Did Sheriff Roberts ever come to you and
3 seek your input before his decision not to reappoint
4 Debbie Woodward? Seek input about Debbie Woodward
5 before his decision not to reappoint her.

6 A. It was not just my input.

7 Q. Whose input did he seek?

8 A. It was the major's and the captain, I
9 believe was in there.

10 Q. Which captain?

11 A. I believe Captain McGee was in the meeting.

12 Q. When did this meeting take place?

13 A. It was a staff meeting.

14 Q. And do you remember when it took place?

15 A. The actual date and time, no, I don't.

16 Q. Do you remember roughly when it was?

17 A. It was some time in late November.

18 Q. Of 2009?

19 A. 2009.

20 Q. What were the criteria being employed to
21 determine who would not be reappointed?

22 A. The discussion was in regards to the
23 overall operation of the office, on the staffing level,
24 the budget restraint shortfalls. Personnel issues.

25 Q. Was loyalty to the sheriff one of the

1 Q. Did the sheriff ask you any questions about
2 Bobby Bland in terms of -- well, any questions at all
3 about Bobby Bland in the fall of 2009?

4 A. No.

5 Q. Did he ask any questions at all about
6 Debbie Woodward in the fall of 2009, that you can
7 recall?

8 A. Not that I can recall, no.

9 Q. Did he ask you any questions about David
10 Dixon in fall of 2009 that you can recall?

11 A. Not that I can recall.

12 Q. Did he ask you any questions about John
13 Sandhofer in fall of 2009 that you can recall?

14 A. Not that I can recall.

15 Q. Did he ask you any questions about Danny
16 Carter in the fall of 2009 that you can recall?

17 A. Not that I can recall.

18 Q. Did he ask you any questions about Robert
19 McCoy in the fall of 2009 that you can recall?

20 A. Not that I can recall.

21 Q. Did he ever ask you about the political
22 leaning or the political involvement of any of these
23 six employees, Woodward, Bland, Dixon, Sandhofer,
24 Carter, or McCoy, in 2009?

25 A. No.

1 Q. Did the sheriff charge the senior
2 officers -- and by the senior officers, I'll name them;
3 Major Wells-Major, you yourself, Major Richardson, or
4 Captain McGee -- with going out into the work force and
5 making his positions known with respect to his
6 reelection?

7 A. No.

8 Q. And so they never did that. They never
9 went out and said: Hey, you should vote for the
10 sheriff?

11 A. No.

12 Q. They never did that?

13 A. No. Not to my knowledge, no.

14 Q. That never happened?

15 A. No.

16 Q. You never did that?

17 A. No.

18 Q. Do you remember the sheriff ever standing
19 up in front of employees and saying: Hey, I think you
20 should support me on election day?

21 A. No.

22 Q. You don't remember that ever happening?

23 A. No.

24 Q. How about ever? Not just 2009, but 2005,
25 2001. Do you remember the sheriff ever standing in